

Response: Plaintiff alleges the Defendants subjected Peter Eugene Alvarado to unlawful custodial interrogation and failed to provide him with reasonable

accommodations.

Defendants, Brazoria County Sheriff's Office, Brazosport Independent School District Police Department, Lighthouse Learning Center, and Captain M. Crittenden deny the claims and allegations in the complaint.

4. Specify the allegation of federal jurisdiction.

Response: Jurisdiction is under 28 U.S.C. § 1331, 42 U.S.C. § 1983, 42 U.S.C. § 12101, and 20 U.S.C. § 1400.

5. Name the parties who disagree and the reasons.

Response: None at this time.

6. List anticipated additional parties that should be included, when they can be added, and by whom they are wanted.

Response: None at this time.

7. List anticipated interventions.

Response: None at this time.

8. Describe class-action issues.

Response: None.

9. State whether each party represents that it has made the initial disclosures required by Rule 26(a). If not, describe the arrangements that have been made to complete the disclosures.

Response: Plaintiff has made initial disclosures. Defendants will make initial disclosures after the Court rules on the Motions to Dismiss and Motions to Stay Discovery and Other Deadlines.

10. Describe the proposed agreed discovery plan, including:

- A. Responses to all the matters raised in Rule 26(f).

Response: All matters are set forth in this filing.

- B. When and to whom the plaintiff anticipates it may send interrogatories.

Response: All defendants at least 60 days before end of the discovery

period.

C. When and to whom the defendant anticipates it may send interrogatories.

Response: The Plaintiff at least 60 days before the end of the discovery period.

D. Of whom and by when the plaintiff anticipates taking oral depositions.

Response: All defendants and defense experts by the end of the discovery period.

E. Of whom and by when the defendant anticipates taking oral depositions.

Response: Plaintiff, individuals Plaintiff identifies as having knowledge of relevant information, and Plaintiff's experts by the end of the discovery period.

F. When the plaintiff (or the party with the burden of proof on an issue) will be able to designate experts and provide the reports required by Rule 26(a)(2)(B), and when the opposing party will be able to designate responsive experts and provide their reports.

Response: Plaintiff can designate experts and provide reports by July 26, 2026, and Defendants 60 days thereafter.

G. List expert depositions the plaintiff (or the party with the burden of proof on an issue) anticipates taking and their anticipated completion date. See Rule 26(a)(2)(B) (expert report).

Response: Within 60 days after Defendants provide expert reports.

H. List expert depositions the opposing party anticipates taking and their anticipated completion date. See Rule 26(a)(2)(B) (expert report).

Response: Within the discovery period.

11. If the parties are not agreed on a part of the discovery plan, describe the separate views and proposals of each party.

Response: No disagreement between the parties.

12. Specify the discovery beyond initial disclosures that has been undertaken to date.

Response: Plaintiff has issued subpoenas to Defendants.

13. State the date the planned discovery can be reasonably completed.

Response: December 4, 2026.

14. Describe the possibilities for a prompt settlement or resolution of the case that were discussed in your Rule 26(f) meeting.

Response: None until some discovery is completed.

15. Describe what each party has done or agreed to do to bring about a prompt resolution.

Response: The Parties remain open to settlement discussion and possible mediation after some discovery.

16. From the attorneys' discussion with the client, state the alternative dispute resolution techniques that are reasonably suitable, and state when such a technique may be effectively used in this case.

Response: Mediation after some discovery.

17. Magistrate judges may now hear jury and non-jury trials. Indicate the parties' joint position on a trial before a magistrate judge.

Response: Parties agree to trial before a magistrate judge.

18. State whether a jury demand has been made and if was made on time.

Response: Jury demand was timely made.

19. Specify the number of hours it will take to present the evidence in this case.

Response:

- Plaintiff anticipates 40 hours.
- Defendant, Brazoria County Sheriff's Office, anticipates 24 hours.
- Defendant,s Brazosport Independent School District Police Department, Lighthouse Learning Center, and Captain M. Crittenden, anticipate 24 hours.

20. List pending motions that could be ruled on at the initial pretrial and scheduling conference.

Response:

- Defendant, Brazoria County Sheriff's Office, Opposed Motion to Dismiss
- Defendants, Brazosport Independent School District Police Department, Lighthouse Learning Center, and Captain M. Crittenden's, Opposed Motion to Dismiss

- Defendant, Brazoria County Sheriff's Office, Opposed Motion to Stay Discovery and Other Deadlines
- Defendants, Brazosport Independent School District Police Department, Lighthouse Learning Center, and Captain M. Crittenden's, Opposed Motion to Stay Discovery and Other Deadlines

21. List other motions pending.

Response: None

22. Indicate other matters peculiar to this case, including discovery, that deserve the special attention of the court at the conference.

Response: None.

23. Certify that all parties have filed Disclosure of Interested Parties as directed in the Order for Conference and Disclosure of Interested Parties, listing the date of filing for original and any amendments.

Response: Plaintiff filed Certificate of Interested Parties on July 29, 2025. Defendant, Brazoria County Sheriff's Office filed Certificate of Interested Parties on February 11, 2026. Defendants, Brazosport Independent School District Police Department, Lighthouse Learning Center, and Captain M. Crittenden filed Certificate of Interested Parties on February 12, 2026.

24. List the names, bar numbers, addresses and telephone numbers of all counsel.

Plaintiff, pro se

Brandon-Meion:Brown

Brandon-Meion Brown
P.O. Box 84
Clute, Texas 77531
Telephone: (281) 908-6300
triocouriers@gmail.com

2/11/26

Date

Counsel for Defendant, Brazosport Independent School District Police Department,
Lighthouse Learning Center, and Captain M. Crittenden

Arlene Gonzalez

Arlene Gonzalez

Texas Bar No. 24109079

THOMPSON & HORTON LLP

Phoenix Tower, Suite 2000

3200 Southwest Freeway

Houston, Texas 77027

Telephone: (713) 554-6744

Fax: (713) 583-8884

agonzalez@thompsonhorton.com

2/12/2026

Date

Christopher Gilbert

Texas Bar No. 00787535

Southern District No. 17283

THOMPSON & HORTON LLP

Phoenix Tower, Suite 2000

3200 Southwest Freeway

Houston, Texas 77027

Telephone: (713) 554-6744

Fax: (713) 583-8884

cgilbert@thompsonhorton.com

Counsel for Defendant, Brazoria County Sheriff's Office

/s/ Airzola Cleaves

Airzola Cleaves

Texas Bar No. 24139392

Southern District Bar. No. 3907331

237 E. Locust, Suite 305

Angleton, Texas 77515

Telephone: (979) 864-1233

Fax: (979) 864-1233

airzolac@brazoriacountytx.gov

February 12, 2026

Date

Ryan Erickson

Texas Bar No. 24091875

Southern District Bar. No. 3851317

237 E. Locust, Suite 305

Angleton, Texas 77515

Telephone: (979) 864-1233

Fax: (979) 864-1233

ryane@brazoriacountytx.gov

Lauren Menia
Texas Bar No. 24092823
Southern District Bar. No. 3877902
237 E. Locust, Suite 305
Angleton, Texas 77515
Telephone: (979) 864-1233
Fax: (979) 864-1233
laurenm@brazoriacountytx.gov